

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

ALL MATTERS RELATED TO NORTH
AMERICAN REFRACTORIES
COMPANY, et al. in Case No. 02-20198, as
affected by the May 24, 2013 Order
Entering Final Decree entered at Doc. No.
7940
Debtors

Misc. Case No. 15-00204-TPA

Chapter 11

HONEYWELL INTERNATIONAL INC.,
Plaintiff,
v.

Adv. No. 21-2097

NORTH AMERICAN REFRACTORIES
COMPANY ASBESTOS PERSONAL
INJURY SETTLEMENT TRUST,
Defendant.

JOINT PROPOSED MODIFICATIONS TO ADMITTED EXHIBITS LIST

The undersigned parties have met and conferred regarding the exhibits listed as admitted in the Court's Post-Trial Order of May 31, 2022. *See* Dkt. No. 386 at 2. The parties have agreed upon a limited set of proposed modifications to the list of exhibits admitted. For the Court's convenience, the parties' proposed modifications are listed below in a redline against Paragraphs 2, 3, and 4 of the Court's Post-Trial Order. Where applicable, the parties have listed supporting citations to the trial transcript.

The proposed modifications are as follows:

(2) The Exhibits admitted into evidence at the trial at the request of the Plaintiff were: B, D, F, H, L, N, T, V, X, Z, AA, AB, AC, AE, AH, AJ, AK, AL, AM, [AO](#), AQ, AR, AS, AT, AU, AV, AW, AZ, BA, BB, BC, BD, BE,¹ BM (pages 2190~~9~~-95), BN (pages 2196-2202), BP, BR (pages 2206-35), BT (pages 2465-67), BU (pages 2534-2608), CO, CP, DJ, DN, DP, DQ, ~~DW, DX~~, ET, EW (pages 6838-73), FA, FE, FG, FX, GA, [GY, HA](#), HG, JS, 49, 197, 3~~5~~[42](#) (pages 9191-92), [394,384](#), CR#5, CR#6, CR#7, CR#8, CR#9, CR#10, CR#11, CR#12, CR#13, CR#15, CR#16, CR#17, CR#18, CR#19, and CR#20.

(3) The Exhibits admitted into evidence at the trial at the request of the Defendant were: E,~~J~~, AX, ~~BA, GY, HA~~, HQ, 1, ~~12~~, 24, 25, 27, 32, 33, 34, 99, 112, 122, 140, 155, 165, 166, 168, 215, 222, 237, 248, 260, 272, 282, 305, 310, 312, 334, 338, 379, [384](#), [CR#1, CR#2](#), CR#3, CR#4, CR#21, CR#22.

(4) The Exhibit admitted into evidence at the trial at the request of Intervenor Future Claimants Representative was: 2.

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Transcript citations for the additional exhibits that the parties believe were admitted are as follows:

Exhibit AO (offered at Honeywell's request)	Tr. (5/23 PM 1) at 87:15-19.
Courtroom Exhibit 1 (offered at Trust's request) ²	Tr. (5/23 AM) at 138:21-140:1.

¹ Honeywell and the Trust are continuing to meet and confer about a potential joint motion to seal certain portions of Exhibit BE pursuant to 11 U.S.C. § 107(b)(1), which they would file by no later than June 13, 2022, or at such time as directed by the Court.

² The Court marked Courtroom Exhibits 1 and 2 at the Trust's request. Upon reviewing the trial transcript, the Trust noticed that it had inadvertently failed to move the admission of those Courtroom Exhibits into the record. With the consent of all parties, the Trust respectfully requests that the Court deem Courtroom Exhibits 1 and 2 to have been admitted at trial.

Courtroom Exhibit 2 (offered at Trust's request)	Tr. (5/23 AM) at 142:25-145:16.
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Transcript citations for proposed modifications to exhibits listed in the Court's Post-Trial Order are as follows:

Exhibit BM (corrected Bates range)	Tr. (5/26 PM) at 7:5-18.
Exhibit GY (admitted at Honeywell's request, rather than Trust's)	Tr. (5/26 AM) at 124:12-18.
Exhibit HA (admitted at Honeywell's request, rather than Trust's)	Tr. (5/26 AM) at 127:13-20.
Exhibit 352 (listed as Exhibit 342 in Post-Trial Order)	Tr. (5/26 AM) at 51:23-52:5.
Exhibit 384 (listed as Exhibit 394 in Post-Trial Order)	Tr. (5/23 PM 1) at 25:1-5.

After a review of the transcripts, the parties were not able to find transcript references for the admission of the following exhibits, which they believe were not admitted: AD, DW, DX, J, and 12.

Dated: June 07, 2022

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